

March 18, 2008

Andrew Fanara **ENERGY STAR Product Development Team Leader** U.S. Environmental Protection Agency 1200 Pennsylvania Ave. NW Washington, DC 20460

Dear Andrew:

On behalf of the Consortium for Energy Efficiency (CEE), I am submitting the following comments on the ENERGY STAR external power supplies specification. These comments were developed based on the CEE Consumer Electronics Committee's discussion of the Revised Final Draft Version 2.0 ENERGY STAR Program Requirements for Single Voltage External Ac-Dc and Ac-Ac Power Supplies initially distributed on February 19, 2008 and revised on March 6, 2008. Thank you for the chance to provide input on this document. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE supports an ENERGY STAR specification level above the new federal minimum standards for external power supplies contained in the Energy Independence and Security Act of 2007. The primary purpose of the ENERGY STAR program is to differentiate in the marketplace products offering an advanced level of energy efficiency. ENERGY STAR's review of the data supporting development of this specification determined that there is still an opportunity for meaningful differentiation in a cost-effective manner. It is very important to voluntary energy-efficiency programs that there are products in the market with this distinguishing characteristic.

We also support the November 1, 2008 proposed effective date for the specification as it applies to EPS manufacturers. This allows manufacturers time to adjust to the new level at the same time they are adjusting to the new minimum standard, while also ensuring ENERGY STAR remains relevant in the market.

Thank you again for the opportunity to comment. If you have any questions about these comments, please direct them to Margie Lynch, CEE Program Manager, at (617) 589-3949 ext. 231.

Sincerely,

Man J. Hoffman Marc Hoffman **Executive Director**

Supporting Organizations

BC Hydro
Efficiency Vermont
NSTAR Electric
Pacific Gas & Electric
Sacramento Municipal Utility District
Southern California Edison
Wisconsin Focus on Energy
Xcel Energy